

STEPHEN R. BASSER (121590)
sbasser@barrack.com
SAMUEL M. WARD (216562)
sward@barrack.com
BARRACK, RODOS & BACINE
One America Plaza
600 West Broadway, Suite 900
San Diego, CA 92101
Telephone: (619) 230-0800
Facsimile: (619) 230-1874

*Attorneys for the Port Authority of Allegheny County Retirement and
Disability Allowance Plan for Employees Represented by Local 85 of the
Amalgamated Transit Union*

CHRISTOPHER J. KELLER
ckeller@labaton.com
JOSEPH A. FONTI
jfonti@labaton.com
LABATON SUCHAROW LLP
140 Broadway
New York, NY 10005
Telephone: (212) 907-0853
Facsimile: (212) 883-7053

Attorneys for the New Orleans Employees' Retirement System

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION**

FRED JEAN, Individually and on
Behalf of All Others Similarly Situated,

Plaintiffs,

v.

STEC, INC., MANOUCH
MOSHAYEDI, and MARK
MOSHAYEDI,

Defendants.

Case No. 8:09-CV-01304-JVS

CLASS ACTION

ORAL ARGUMENT REQUESTED

DATE: February 8, 2010

TIME: 1:30 p.m.

CTRM: 10C

Honorable James V. Selna

**DECLARATION OF SAMUEL M. WARD IN
SUPPORT OF MOTION TO CONSOLIDATE RELATED
CASES, APPOINT CO-LEAD PLAINTIFFS AND APPROVE OF
CO-LEAD PLAINTIFFS' SELECTION OF CO-LEAD COUNSEL**

HADI SAKHAI, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

STEC, INC., MANOUCH
MOSHAYEDI, MARK MOSHAYEDI,
RAYMOND D. COOK, J.P. MORGAN
SECURITIES INC., DEUTSCHE
BANK SECURITIES INC.,
BARCLAYS CAPITAL INC. and
OPPENHEIMER & CO. INC.,

Defendants.

Case No. 8:09-CV-01306-JVS

CLASS ACTION

FRED GREENWALD, Individually and
on Behalf of All Others Similarly
Situating,

Plaintiff,

v.

STEC, INC., MANOUCH
MOSHAYEDI, and MARK
(MERHADAD) MOSHAYEDI

Defendants.

Case No. 8:09-CV-01315-JVS

CLASS ACTION

DANIEL MUNTER, Individually and
on Behalf of All Others Similarly
Situating,

Plaintiff,

v.

STEC, INC., MANOUCH
MOSHAYEDI, MARK MOSHAYEDI,
AND RAYMOND D. COOK,

Defendants.

Case No. 8:09-CV-01320-JVS

CLASS ACTION

1 MARCEL WEINBERGER, Individually) Case No. 8:09-CV-01460-JVS
2 and on Behalf of All Others Similarly) CLASS ACTION
3 Situated,)
4)
5 Plaintiff,)
6 v.)
7)
8 STEC, INC., MANOUCH)
9 MOSHAYEDI, MARK MOSHAYEDI,)
10 AND RAYMOND D. COOK,)
11)
12 Defendants.)

8 JONATHAN FISCHER, Individually) Case No. 2:09-CV-08536-JVS
9 and on Behalf of All Others Similarly) CLASS ACTION
10 Situated,)
11)
12 Plaintiff,)
13 v.)
14)
15 STEC, INC., MANOUCH)
16 MOSHAYEDI, MARK MOSHAYEDI,)
17 AND RAYMOND D. COOK,)
18)
19 Defendants.)
20
21
22
23
24
25
26
27
28

Samuel M. Ward, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am admitted to, and a member in good standing of, the bar of the Supreme Court of California and the United States District Court for the Central District of California, as well as various other state and federal courts. I submit this declaration in support of the motion filed by the Port Authority of Allegheny County Retirement and Disability Allowance Plan for Employees Represented by Local 85 of the Amalgamated Transit Union (“ATU 85”) and the New Orleans Employees’ Retirement System (“New Orleans”) to consolidate all related actions, appoint them as the co-lead plaintiffs for these consolidated actions and approve their selection of co-lead counsel. Attached as exhibits are true and correct copies of the following:

Exhibit 1: Notice dated November 6, 2009, of the filing of Jean’s complaint in the Central District of California against STEC, Inc. and others;

Exhibit 2: Certification of ATU 85;

Exhibit 3: Certification of New Orleans;

Exhibit 4: Loss Charts of ATU 85 and New Orleans;

Exhibit 5: Firm Biography of Barrack, Rodos & Bacine; and

Exhibit 6: Firm Biography of Labaton Sucharow LLP.

I declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge.

DATED: January 5, 2010

/s/ SAMUEL M. WARD

SAMUEL M. WARD